

BENJAMIN R. LEVINSON-SBN 116675
LAW OFFICE OF BENJAMIN R. LEVINSON
A Professional Corporation
4340 Stevens Creek Blvd., Suite 199
San Jose, CA 95129
Telephone: (408) 866-2999
Facsimile: (408) 866-2992
E-Mail: ben@benlevinsonlaw.com

Attorney for Secured Creditors Behrooz R. Shahab and
Laurie A. Shahab, Trustees of The Shahab Family
Revocable Trust, Dated 7/31/2000, Gregory Galen Lin,
and Stephen E. Fournier, Trustee Fournier Tax Consulting 401K

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
(San Jose Division)

In re:

Case No. 21-51255-MEH
Chapter 11

DUTCHINTS DEVELOPMENT, LLC,

RS No. BRL-355

NOTICE OF HEARING ON MOTION FOR
ORDER TERMINATING AUTOMATIC
STAY OR REQUIRING ADEQUATE
PROTECTION

Debtor.

DATE: December 10, 2021

TIME: 10:00 a.m.

DEPT: **Via Video/Teleconference¹**

To Debtor DUTCHINTS DEVELOPMENT, co-borrower Madeleine Tashjian, the United States
Trustee; and to Debtor's Attorney of Record:

NOTICE IS HEREBY GIVEN that on December 10, 2021, at 10:00 a.m., or as soon thereafter as
the matter can be heard before the Honorable M. Elaine Hammond, United States Bankruptcy Judge,
Movants BEHROOZ R. SHAHAB and LAURIE A. SHAHAB, TRUSTEES OF THE SHAHAB

¹ Please see Judge Hammond's posted calendar for this hearing at www.canb.uscourts.gov for information on how to
attend via video or teleconference.

1 FAMILY REVOCABLE TRUST, DATED 7/31/2000, GREGORY GALEN LIN, and STEPHEN E.
2 FOURNIER, TRUSTEE FOURNIER TAX CONSULTING 401K (collectively “Movants”) will, and
3 hereby do, move the Court to make an Order terminating the automatic stay for lack of equity and cause
4 under 11 U.S.C. § 362(d) with respect to the interest of Debtor and the estate’s interest in the real property
5 described as 1226 Phyllis Avenue, Mountain View, California, 94040 (the “Property”) as set forth in the
6 deed of trust attached to the declaration filed herewith.

7 **The hearing will not be conducted in the presiding judge’s courtroom but instead will be**
8 **conducted by telephone or video.** All interested parties should consult the Bankruptcy Court’s website
9 at www.canb.uscourts.gov for information about court operations during the COVID-19 pandemic. The
10 Bankruptcy Court’s website provides information regarding how to arrange a telephonic or video
11 appearance. If you have any questions regarding how to appear at a court hearing, you may contact the
12 Bankruptcy Court by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy Court’s
13 website.

14
15 **NOTICE IS HEREBY FURTHER GIVEN that, should you fail to appear, either personally**
16 **or through your attorney or representative at the time and place hereinabove set for hearing, the**
17 **Bankruptcy Judge may grant the relief sought by Movants and may make an order terminating the**
18 **automatic stay of 11 U.S.C. § 362(d) and authorizing and permitting Movants to begin and/or**
19 **complete a foreclosure sale of the Property under Movant’s loan, with waiver of Bankruptcy Rule**
20 **4001(a)(3) and California Civil Code § 2924g(d) to the extent that it applies and allowing the**
21 **purchaser to obtain possession of the Property under California law without further order of the**
22 **Court.**

23
24
25 Dated: November 18, 2021

24 Law Office of Benjamin R. Levinson
A Professional Corporation
25 /S/ BENJAMIN R. LEVINSON
BENJAMIN R. LEVINSON,
26 Attorney for Movants